

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION)	
)	
Plaintiff,)	
)	
vs.)	
)	Case No.: 19-CV-4137 (KAM)
MICHAEL J. BLACK)	
)	
Defendant.)	

DEFENDANT MICHAEL J. BLACK'S ACCOUNTING OF ASSETS

Pursuant to the Court's July 17, 2019 Order [D.E. 7], Defendant, Michael J. Black, hereby submits in writing, through his counsel, an accounting of:

1. *All assets, liabilities, and property currently held, directly or indirectly, by or for the benefit of each Defendant, including, without limitation, bank accounts, brokerage accounts, investments, business interests, loans, lines of credit, and real and personal property wherever situated, describing each asset and liability, its current location and amount.*

Mr. Black respectfully asserts his privileges under the Fifth Amendment to the United States Constitution and declines to respond to this question.

2. *All money, property, assets, and income received by each such Defendant for his direct or indirect benefit from the other Defendants, at any time from June 1, 2016, through the date of such accounting, describing the amount, disposition, and current location of each of the items listed.*

Mr. Black respectfully asserts his privileges under the Fifth Amendment to the United States Constitution and declines to respond to this question.

3. *The name and last known addresses of all bailees, debtors, and other persons and entities that currently are holding the assets, funds, or property of each Defendant.*

Mr. Black respectfully asserts his privileges under the Fifth Amendment to the United States Constitution and declines to respond to this question.

4. *All assets, funds, securities and real or personal property invested by each such Defendant, or any other person controlled by them, and the disposition of such assets, funds, securities, and real or personal property.*

Mr. Black respectfully asserts his privileges under the Fifth Amendment to the United States Constitution and declines to respond to this question.

5. *All transfers or payments of any funds or other assets to or from the Defendants, or to any person or entity for their direct or indirect benefit, subject to their direct or indirect control, over which they exercise actual or apparent authority, or in which they have a direct or indirect beneficial interest, at any time from June 1, 2016, to through the date of such accounting—the identification shall include the date and amount of each transfer or payment, the name and address of the recipient, and, if applicable, the name, address, and account number of any bank, brokerage firm, or other financial institution of the person or entity making and the person or entity receiving the transfer or payment.*

Mr. Black respectfully asserts his privileges under the Fifth Amendment to the United States Constitution and declines to respond to this question.

6. *The location of any funds or other assets involved in any transfer or payment identified in response to paragraph []5 above that are currently in the Defendants' possession or held by any person or entity for their direct or indirect benefit, subject to their direct or indirect control, over which they exercise actual or apparent authority, or in which they have a direct or indirect beneficial interest—the identification shall include the name and address of each person or entity holding such funds or other assets, and, if applicable, the name, address, and account number of any bank, brokerage firm, or other financial institution where the funds or other assets are currently held.*

Mr. Black respectfully asserts his privileges under the Fifth Amendment to the United States Constitution and declines to respond to this question.

7. *The location or other disposition of any funds or other assets involved in any transfer or payment identified in response to paragraph []5 above that are no longer in the Defendants' possession or held by any person or entity for their direct or indirect benefit, subject to their direct or indirect control, over which they exercise actual or apparent authority, or in which they have a direct or indirect beneficial interest—the identification shall include the name and address of each person or entity currently holding the funds or other assets, the dollar value held by each person or entity, an explanation of when and how each person or entity received the funds or other assets, and, if applicable, the name, address, and account number of any bank, brokerage firm, or other financial institution where the funds or other assets are currently being held.*

Mr. Black respectfully asserts his privileges under the Fifth Amendment to the United States Constitution and declines to respond to this question.

Respectfully Submitted,

/s/ SETH WAXMAN

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